

ULTRASOUND ACCESS COALITION

We urge you to protect access to critical ultrasound services

In its Calendar Year 2019 Physician Fee Schedule proposed rule, CMS proposed to **drastically reduce the general ultrasound room price by 65%**, from \$369,945 to \$130,253. This would have a downstream impact on the vascular ultrasound room, resulting in a 57% reduction, from \$466,492 to \$199,449. The Year 1 (2019) impact of this proposal would be an **overall 9% reimbursement reduction** for physicians offering ultrasound services. Once fully implemented, this proposal is expected to **reduce overall reimbursement by 40%**, with some specific ultrasound procedures approaching a 50% reduction.

Projected Impact on Selected Ultrasound Code RVU's				
CPT Code	Description	2018	2022	Reduction
76536 TC	US Exam of Head and Neck	2.51	1.45	42.2%
76830 TC	Transvaginal US Non-OB	2.48	1.51	39.1%
93306 TC	TTE with Doppler, Complete	3.80	2.27	40.2%
93970 TC	Extremity Study	4.52	2.86	36.8%

Concerns with CMS' Process and Methodology

Overall, we are concerned that ***CMS' analysis contains inaccuracies, omissions, and inappropriately relied on hospital data*** to determine non-hospital pricing and subsequently reimbursement. Specifically:

- ✖ CMS was not transparent in terms of its data sources and ultrasound equipment assessed
- ✖ CMS significantly and inappropriately relied on hospital pricing data
- ✖ CMS did not collaborate or work with ultrasound stakeholders
- ✖ CMS did not appropriately price the equipment required for a fully functional ultrasound room

Reduced Access to Ultrasound Services

We are concerned that ***CMS' proposal will reduce access to ultrasound services in community-based settings***. According to the physicians who perform the vast majority of ultrasound procedures, this proposal:

- Puts independent imaging centers and physician offices at risk of closure
- Will force physicians to stop providing ultrasound services to Medicare beneficiaries
- Will drive ultrasound services out of the community

UAC's Commitment to Access and Appropriate Pricing

Our primary concern is that a 40% reduction in reimbursement will significantly reduce patient access to ultrasound services. ***We are committed to working with CMS to determine appropriate pricing for ultrasound equipment***, but in order to effectively do so, ***CMS must not finalize this proposal***. Instead, we suggest CMS:

1. Undertake a validation process involving the appropriate ultrasound stakeholders to review the equipment list for the general ultrasound room.
2. Task the RUC with updating and revising current ultrasound room specifications.
3. Collaborate with physicians and manufacturers to more accurately establish the prices for the relevant ultrasound equipment.